

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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LUIS INGA (AND WIFE CARMEN INGA)

07CV4474

Plaintiffs,

ANSWER TO
AMENDED COMPLAINT

against .

233 BROADWAY OWNERS, LLC, 63 WALL
STREET INC, 63 WALL, INC., 90 CHURCH
STREET LIMITED PARTNERSHIP, AJ
GOLDSTEIN & CO., ALAN KASMAN DBA
KASCO, ALAN L. MERRIL, AMBIENT GROUP,
INC., ANN TAYLOR STORES CORPORATION,
BANKERS TRUST COMPANY, BANKERS
TRUST CORP., BANKERS TRUST NEW YORK
CORPORATION, BATTERY PARK CITY
AUTHORITY, BELFOR USA GROUP, INC.,
BETTY JEAN GRANQUIST, BFP ONE LIBERTY
PLAZA CO., LLC., BLACKMON-MOORING
STEAMATIC CATASTROPHE, INC. D/B/A BMS
CAT, BOARD OF EDUCATION OF THE CITY
OF NEW YORK, BOSTON PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC., BROWN
BROTHERS HARRIMAN & CO., INC., BT
PRIVATE CLIENTS CORP., CAROL GAYNOR
TRUST, CAROL GAYNOR, AS TRUSTEE OF
THE CAROL GAYNOR TRUST, CAROL
MERRIL GAYNOR, CHASE MANHATTAN
BANK, DEPARTMENT OF BUSINESS
SERVICES, DEUTSCHE BANK TRUST
COMPANY, DEUTSCHE BANK TRUST
COMPANY AMERICAS, DEUTSCHE BANK
TRUST CORPORATION, ENVIROTECH CLEAN
AIR, INC., FGP 90 WEST STREET INC., FRED
GOLDSTEIN, GENERAL RE SERVICES CORP.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,

HARLAND GAYNOR, AS TRUSTEE UNDER A
DECLARATION OF TRUST, HAROLD G.
GOLDSTEIN, AS TRUSTEE UNDER A
DECLARATION OF TRUST, HERMAN L.
BLUM, AS TRUSTEE UNDER THE LAST WILL
AND TESTAMENT OF LOUIS W. GOLDSTEIN,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
IDELL GOLDSTEIN, AS TRUSTEE UNDER
DECLARATION OF TRUST, INDOOR
ENVIRONMENTAL TECHNOLOGY, INC.;
JONES LANG LASALLE AMERICAS, INC.,
JONES LANG LASALLE SERVICES, INC.,
KASCO RESTORATION SERVICES CO.,
KIBEL COMPANIES, MARGARET G.
WATERS, MARGUERITE K. LEWIS,
AS TRUSTEE UNDER THE LAST
WILL AND TESTAMENT OF LOUIS W.
GOLDSTEIN, MATTHEW A. GELBIN,
AS TRUSTEE OF THE GELBIN FAMILY,
MERRILL LYNCH & CO, INC.,
NATALIE S. LEBOW, AS TRUSTEE OF THE
JEREMIAH PHILIP LEBOW REVOCABLE
TRUST, NATALIE S. LEBOW, AS TRUSTEE OF
THE JERRY P. LEBOW FAMILY TRUST,
NATIONAL ASSOCIATION OF SECURITIES
DEALERS, INC., NEW LIBERTY PLAZA LP,
NEW YORK CITY INDUSTRIAL
DEVELOPMENT AGENCY, NEW YORK CITY
INDUSTRIAL DEVELOPMENT
CORPORATION, NEW YORK CITY SCHOOL
CONSTRUCTION AUTHORITY, NOMURA
HOLDING AMERICA, INC., NOMURA
SECURITIES INTERNATIONAL, INC., ONE
LIBERTY PLAZA, PAMELA BETH KLEIN, AS
TRUSTEE OF THE PAMELA AND ROWAN
KLEIN TRUST, ROWAN K KLEIN, AS
TRUSTEE OF THE PAMELA AND ROWAN
KLEIN TRUST, RUTH G. LEBOW, SHIRLEY O.
SHOCKLEY, AS TRUSTEE UNDER
DECLARATION OF TRUST, STRUCTURE
TONE (UK), INC., STRUCTURE TONE
GLOBAL SERVICES, INC., SYLVIA R.
GOLDSTEIN, THE BANK OF NEW YORK
TRUST COMPANY NA, THE BOARD OF
MANAGERS OF THE ONE LIBERTY PLAZA
CONDOMINIUM (CONDO #1178), THE ONE

LIBERTY PLAZA CONDOMINIUM (CONDO
#1178), TISHMAN INTERIORS CORPORATION,
TOSCORP INC., TRIBECA LANDING L.L.C.,
TRINITY REAL ESTATE, TULLY
CONSTRUCTION CO., INC., TULLY
INDUSTRIES, INC, VERIZON NEW YORK,
INC, WESTON SOLUTIONS, INC., WFP ONE
LIBERTY PLAZA CO., L.P., WFP ONE
LIBERTY PLAZA, CO. GP, CORP., WFP
TOWER B CO. G.P. CORP., WFP TOWER B
HOLDING CO., LP, WFP TOW, ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

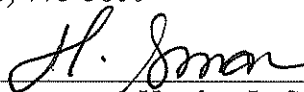
WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
April 1, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY:



Heather L. Smar (4622)